

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

ZENITH ELECTRONICS CORPORATION,

Plaintiff,

v.

THOMSON INC.; THOMSON SA; PHILIPS
ELECTRONICS NORTH AMERICA
CORPORATION; KONINKLIJKE PHILIPS
ELECTRONICS N.V.; TTE
TECHNOLOGY, INCORPORATED; TTE
CORPORATION; PIONEER
ELECTRONICS (USA), INCORPORATED;
AND PIONEER CORPORATION,

Defendants.

Case No. 5:06-cv-00017-DF

STIPULATION OF DISMISSAL

WHEREAS: (1) on January 30, 2006, Plaintiff Zenith Electronics Corporation (“Zenith”) filed a Complaint with this Court commencing this civil action against, among other parties, Defendant Philips Electronics North America Corporation and Defendant Koninklijke Philips Electronics N.V. (collectively, the “Philips Defendants”); (2) on April 20, 2006, Zenith filed an Amended Complaint against the Philips Defendants and others in this civil action; (3) on May 17, 2006, the Philips Defendants filed a Motion to Dismiss; (4) on June 21, 2006, Zenith filed an Opposition to the Philips Defendants’ Motion to Dismiss; (5) on July 14, 2006, the Philips Defendants filed a Reply In Support of Their Motion to Dismiss; (6) on August 21, 2006, Zenith filed a Second Amended Complaint against the Philips Defendants and others in this civil action; (7) on September 15, 2006, Zenith and the Philips Defendants filed a Stipulation

Regarding Responsive Pleading to the Second Amended Complaint; and (8) Zenith and the Philips Defendants have reached a mutually satisfactory resolution of all issues between them that were the subject of this Action.

NOW, THEREFORE, pursuant to the Federal Rule of Civil Procedure 41(a)(2), Zenith and the Philips Defendants jointly request and stipulate to the entry of an Order providing that:

- (1) The action between Zenith and the Philips Defendants be dismissed with prejudice;
- (2) Each of the parties shall bear its own costs, expenses, and attorney fees associated with the prosecution and defense of this matter;
- (3) This Court shall retain exclusive jurisdiction over this matter for purposes of enforcement of this settlement; and
- (4) The unresolved pending Motion to Dismiss as between the settling parties shall be denied as moot.

Dated: March 15, 2007

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Dated: March 15, 2007

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Federal Rule of Civil Procedure 5 and Local Rule CV-5(d), counsel listed below were served with a true and correct copy of this document via U.S. First Class Mail this 15th day of March, 2007.

David Ben-Meir	(Attorney for TTE Technology, Inc. and TTE Corp.)
Jim Oliva	(Attorney for Pioneer Electronics (USA), Inc. and Pioneer Corp.)
Richard Redano	(Attorney for Thomson, Inc. and Thomson SA)
Cynthia Vreeland	(Attorney for Philips Electronics North America Corp. and Koninklijke Philips Electronics N.V.)

/s/ Ricardo Rodriguez (with permission)
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